# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF GEORGIA STATESBORO DIVISION

CR624-01	5	
----------	---	--

UNITED STATES OF AMERICA	) INDICTMENT NO.	
v.	) ) 18 U.S.C. § 1001	
	) False Statement or Representat	tion
STEPHANIE RANGEL VAZQUEZ	) 0	
	) 18 U.S.C. § 1028A	
	) Aggravated Identity Theft	

#### THE GRAND JURY CHARGES THAT:

#### COUNT ONE

False Statement or Representation 18 U.S.C. § 1001

On or about January 24, 2024, in Toombs County and elsewhere, within the Southern District of Georgia, the Defendant,

## STEPHANIE RANGEL VAZQUEZ,

did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by falsely and fraudulently filing a WH-530, Initial or Renewal Application for a Farm Labor Contractor Certificate of Registration. The statements and representations were false because, as the Defendant then and there knew, she was falsely and fraudulently identifying as another person.

# COUNT TWO

Aggravated Identity Theft 18 U.S.C. § 1028A

On or about January 24, 2024, in Toombs County and elsewhere, within the Southern District of Georgia, the Defendant,

## STEPHANIE RANGEL VAZQUEZ,

did knowingly possess and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c)(4), to wit: 18 U.S.C. § 1001(a), as alleged in Count One, knowing that the means of identification belonged to another actual person.

# **COUNT THREE**

False Statement or Representation 18 U.S.C. § 1001

On or about February 15, 2024, in Toombs County, within the Southern District of Georgia, the Defendant,

### STEPHANIE RANGEL VAZQUEZ,

did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by falsely and fraudulently filing an ETA-790A. The statements and representations were false because, as the Defendant then and there knew, she was falsely and fraudulently identifying as another person.

#### **COUNT FOUR**

False Statement or Representation 18 U.S.C. § 1001

On or about March 18, 2024, in Toombs County, within the Southern District of Georgia, the Defendant,

### STEPHANIE RANGEL VAZQUEZ,

did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by falsely and fraudulently filing an ETA-9142A. The statements and representations were false because, as the Defendant then and there knew, she was falsely and fraudulently identifying as another person.

### **COUNT FIVE**

False Statement or Representation 18 U.S.C. § 1001

On or about May 1, 2024, in Jeff Davis County, within the Southern District of Georgia, the Defendant,

### STEPHANIE RANGEL VAZQUEZ,

did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by falsely and fraudulently filing a DHS Form I-129, Petition IOE8800866459. The statements and representations were false because, as the Defendant then and there knew, she was falsely and fraudulently identifying as another person.

A T.... D;11

Jill E. Steinberg

United States Attorney

Ryan E. Bondura

Assistant United States Attorney \*Lead Counsel

Tania D. Groover

Assistant United States Attorney

Chief, Criminal Division